

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	PUBLIC VERSION
)	
Defendant.)	

**DECLARATION OF KEITH A. WALKER IN SUPPORT OF IBM'S MOTION TO
EXCLUDE OCEAN TOMO'S EMPLOYEES FROM ACCESSING CONFIDENTIAL
INFORMATION UNDER THE PROTECTIVE ORDER**

OF COUNSEL:

John M. Desmarais
Jon T. Hohenthanner
Karim Oussayef
Laurie N. Stempler
Robert C. Harrits
Brian D. Matty
Michael Matulewicz-Crowley
Brian D. Matty
Kevin K. McNish
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyne@potteranderson.com

*Attorneys for Plaintiff International Business
Machines Corporation*

Dated: September 6, 2017
Public Version Dated: September 13, 2017

**THIS DOCUMENT HAS BEEN
REDACTED IN ITS ENTIRETY**